

EXHIBIT 1

From: [Lusk, Lindsey A.](#)
To: [McCloskey, Elizabeth K.](#); [Kieckhefer, L. Kieran](#)
Cc: [Caslin, Brent](#); [Pillay, Shoba](#); [ElDessouki, Ahmed](#); [Yang, Betty X.](#); [Myrold, Christina](#)
Subject: RE: TriZetto Complaint -- Request to Accept Service
Date: Thursday, November 14, 2024 3:20:00 PM

Hi Elizabeth,

Thanks again for your patience. We agree to that extension.

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Thursday, November 14, 2024 3:12 PM
To: Lusk, Lindsey A. <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AElDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

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Thanks, Lindsey.

Elizabeth K. McCloskey
Partner

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EMcCloskey@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
One Embarcadero Center Suite 2600, San Francisco, CA 94111-3715

From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Wednesday, November 13, 2024 3:16 PM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AElDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Hi Elizabeth,

We are consulting with our client, but, given the time difference, likely will not be able to get back to

you on this until tomorrow. Thank you for your patience.

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Wednesday, November 13, 2024 11:56 AM
To: Lusk, Lindsey A. <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
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Hi Lindsey,

TriZetto's responses to Infosys's discovery responses are due on November 25, the Monday of Thanksgiving week. In light of the holiday and related conflicts, we'd like to request an extension of time to respond. Are you amenable to a three-week extension, to December 16?

Thanks very much,
Elizabeth

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EMcCloskey@gibsondunn.com

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From: McCloskey, Elizabeth K.
Sent: Tuesday, October 29, 2024 10:22 PM
To: 'Lusk, Lindsey A.' <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Thanks for following up, Lindsey. We agree to your request for a two-week extension on the initial disclosures. We'll plan for both parties to serve their disclosures on November 21. With respect to the report to the Court, we will prepare and send over a draft.

Thanks,
Elizabeth

Elizabeth K. McCloskey
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From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Monday, October 28, 2024 1:25 PM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEldessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Elizabeth,

I'm following up on our meet and confer from last week. We considered the schedule you proposed but continue to believe that setting a schedule is premature until the pleadings are settled and we have more specificity regarding the supposed trade secrets at issue. I believe our report to the court following our meet and confer is due on Nov. 7, 2024. Please advise whether you are drafting the report in the first instance or if you would like us to. Also, please let us know if you are OK with the two-week initial disclosure extension we proposed on the call.

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Friday, October 18, 2024 11:25 AM
To: Lusk, Lindsey A. <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEldessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
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Thanks, Lindsey. We are available at 2pm PT on 10/24. We'll send a calendar invite.

As to your motion to seal, we have no objection to that motion and appreciate you reaching out.

Thanks,
Elizabeth

Elizabeth K. McCloskey
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GIBSON DUNN

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From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Thursday, October 17, 2024 12:39 PM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Hi Elizabeth,

We can be available the following days / times next week for the Rule 26 conference:

- Thursday: Any time after 2 PT
- Friday: Any time before noon PT

Please let us know if either of these windows work.

Thanks,
Lindsey

From: Lusk, Lindsey A.
Sent: Wednesday, October 16, 2024 4:48 PM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Elizabeth,

I'm following up on the voicemail I just left you. As I mentioned, I am unavailable to meet and confer on Friday. I am in a deposition that day. I am also still getting the availability of others on my team who will be participating in the Rule 26 conference. I will provide you with our availability for that conference as soon as I have it.

Separate from any Rule 26 conference, we need to know your position on our motion to seal. As I mentioned, we are seeking to seal the four attached NDAs, which Cognizant has stamped as confidential and, in some cases, trade secrets. Given these designations and the fact that Cognizant kept the identity of the clients related to the NDAs confidential in its Complaint, we presume Cognizant will want these documents filed under seal, hence why we have prepared our motion.

Please advise as to your position on whether these documents need to be sealed. As I said in my voicemail, I'm happy to discuss further on the phone. I am available the rest of today as well as tomorrow before noon PT. I can be reached at 312-982-6752.

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Wednesday, October 16, 2024 12:32 PM
To: Lusk, Lindsey A. <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
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Hi Lindsey,

There's no basis for delaying the Rule 26(f) conference. Rule 26(f)(1) is clear that "the parties must confer as soon as practicable," and it is well established that "[f]iling a Rule 12(b)(6) motion to dismiss does not automatically stay discovery or require postponing a Rule 26(f) conference until the motion is resolved." *Escareno ex rel. A.E. v. Lundbeck, LLC*, 2014 WL 1976867, at *2 (N.D. Tex. May 15, 2014). To allow you more preparation time, we suggest meeting on Friday rather than this afternoon. We would like to combine the calls for efficiency's sake. Please let us know if 8:30am PT works for you on Friday.

Thanks,
Elizabeth

Elizabeth K. McCloskey
Partner

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EMcCloskey@gibsondunn.com

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Gibson, Dunn & Crutcher LLP
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From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Wednesday, October 16, 2024 9:07 AM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Elizabeth,

Thanks so much for getting back to us with your availability. In terms of the topics for this meet and confer, we would prefer to hold off on discussing discovery until after we have filed our motion to dismiss next week. Any discussion of discovery will be impacted by our motion as well as other issues. We want to be properly prepared for the discussion, so we would prefer to schedule a separate conference to discuss those issues. I will check schedules on our side and will follow up with you re availability for that after we file our motion next week. Please let me know if there are any days in the coming weeks when you know your side will not be available for the discovery discussion.

In terms of your availability this week, we can do today from 3:30 – 4 pm PT re the motion to seal. It should be a straightforward discussion. Please let me know which number I should call.

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Tuesday, October 15, 2024 7:15 PM
To: Lusk, Lindsey A. <LLusk@jenner.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
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Lindsey,

Yes, we are available to meet and confer. We would also like to schedule a Rule 26(f)

conference this week. To make this efficient, we suggest covering both topics on one call. Here are times that work for us this week (all PT):

- Wednesday 9:30-10 am, 3:30-4 pm
- Friday 8:30-9 am

Thanks,
Elizabeth

Elizabeth K. McCloskey
Partner

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EMcCloskey@gibsondunn.com

GIBSON DUNN

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From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Monday, October 14, 2024 10:56 AM
To: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Hi all,

Infosys intends to file a motion to seal certain documents alongside its upcoming response to TriZetto's Complaint. According to the local rules, the parties need to meet and confer before the motion is filed. Will you please let us know who is available to meet to discuss this issue sometime this week?

Thanks,
Lindsey

From: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>
Sent: Wednesday, August 28, 2024 1:42 PM
To: Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; Lusk, Lindsey A. <LLusk@jenner.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>

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Thanks again for confirming, Lindsey. Attached is a form waiving service of summons. Could you please complete this form and return to us so we can file with the Court?

Thanks,
Elizabeth

Elizabeth K. McCloskey
Partner

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EMcCloskey@gibsondunn.com

GIBSON DUNN

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From: Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Sent: Monday, August 26, 2024 11:03 AM
To: Lusk, Lindsey A. <LLusk@jenner.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Thanks Lindsey.

From: Lusk, Lindsey A. <LLusk@jenner.com>
Sent: Monday, August 26, 2024 7:10 AM
To: Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: Caslin, Brent <BCaslin@jenner.com>; Pillay, Shoba <SPillay@jenner.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

[WARNING: External Email]

Kieran,

I'm one of the attorneys representing Infosys in this case. I wanted to follow up on Brent's email to let you know that we will accept service.

Thanks,
Lindsey

From: Caslin, Brent <BCaslin@jenner.com>
Sent: Friday, August 23, 2024 12:17 PM
To: Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Cc: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; ElDessouki, Ahmed <AEldessouki@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: RE: TriZetto Complaint -- Request to Accept Service

Hello Kieran. Thank you for letting me know. I'm in an arbitration today. Will inquire and one of us will respond to you, but it may not be until Monday because I'm tied up today. Brent.

Brent Caslin

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From: Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>
Sent: Friday, August 23, 2024 10:53 AM
To: Caslin, Brent <BCaslin@jenner.com>
Cc: McCloskey, Elizabeth K. <EMcCloskey@gibsondunn.com>; Yang, Betty X. <BYang@gibsondunn.com>; ElDessouki, Ahmed <AEldessouki@gibsondunn.com>; Myrold, Christina <CMyrold@gibsondunn.com>
Subject: TriZetto Complaint -- Request to Accept Service

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Dear Brent,

Enclosed is the complaint that TriZetto filed today against Infosys. Please let us know if you will accept service on behalf of Infosys.

All the best,
Kieran

L. Kieran Kieckhefer

GIBSON DUNN

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